

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

MEGANNE NATALE and CHELSEA
CHENG, individually and on behalf of all
others similarly situated,

Plaintiffs,

v.

9199-4467 QUEBEC INC., d/b/a EARTH
RATED,

Defendant.

Case No. 2:21-cv-6775-JS-SIL

Hon. Joanna Seybert

**PLAINTIFFS' NOTICE OF UNOPPOSED MOTION FOR
FINAL APPROVAL OF CLASS ACTION SETTLEMENT**

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on October 23, 2024 at 10:30 a.m., before the Honorable Joanna Seybert, United States District Court Judge for the Eastern District of New York, at the Alfonse M. D'Amato Federal Building, 100 Federal Plaza, Courtroom 1030, Central Islip, New York 11722, Plaintiffs Meganne Natale and Chelsea Cheng, by and through Class Counsel, will move and hereby do move for an order: (i) finally approving the Class Action Settlement, and (ii) certifying the Settlement Class.

PLEASE TAKE FURTHER NOTICE that, in support of the motion, Plaintiffs will rely upon: (i) the accompanying memorandum of law in support; (ii) the Declaration of Max S. Roberts and the exhibits attached thereto; and (iii) the Declaration of Ryan Bahry of JND Legal Administration and the exhibits attached thereto.

A [Proposed] Order Granting Final Approval of Class Action Settlement and Entering Judgment is submitted herewith.

Dated: September 9, 2024

Respectfully submitted,

By: /s/ Max S. Roberts
Max S. Roberts

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